



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** OCT 23 2017  
**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Schnitzer, Manchester, NH  
**FROM:** Natalie Topinka, Environmental Scientist  
AECAB (IL/IN)  
**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)  
**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Schnitzer

**Facility Location:** 200 Allard Drive, Manchester, NH

**Date of Inspection:** July 28, 2017

**EPA Inspector(s):**

1. Natalie Topinka, Environmental Scientist
2. Abdi Mohamoud, Environmental Engineer

**Other Attendees**

1. Tom Bohner, Facility and Operations Supervisor, Schnitzer
2. Rich Camosino, Regional EH & S Manager, Schnitzer (via phone)

**Purpose of Inspection:** Assess compliance with the safe disposal regulations pertaining to refrigerant-containing appliances and motor vehicle air conditioners.

**Facility Type:** scrap metal recycler

**Regulations Central to Inspection:** 40 CFR Part 82 Subpart F

**Arrival Time:** 9:20 am

**Departure Time:** 10:00 am

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Tom Bohner unless otherwise noted.

**Process Description:**

Schnitzer's Manchester facility accepts a variety of metal items from members of the public and local municipalities and businesses to be sorted for recycling. No shredding, crushing, baling, or torch cutting operations are conducted at the Manchester location.

**Staff Interview:** Mr. Bohner stated that the Manchester facility accepts for recycling vehicles and small appliances, such as refrigerators and window air conditioners. Schnitzer does not recover refrigerant from the appliances or vehicle air conditioners. Mr. Bohner estimated that the facility receives approximately 100 small appliances and fewer than one vehicle per week. Schnitzer requires its customers to sign a "Hazardous Materials Removal Compliance Contract (HMCC)". Mr. Bohner stated that many appliances were received from the Northeast Resource Recovery Association (NRRA), a recycling cooperative used by many local municipalities, and that the items received by NRRA had the refrigerant removed prior to arrival at Schnitzer. Schnitzer encourages customers to cut refrigerant lines after the refrigerant is removed to demonstrate that the item is empty of refrigerant.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

We toured the facility and observed small appliances and at least one vehicle on the scrap pile. We observed signage that stated that CFCs should be removed and reclaimed before the item enters the facility, and additional very faded signage that appeared to list refrigerants under prohibited materials.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were not taken during this inspection.

**RECORDS REVIEW**

1. Hazardous Materials Removal Compliance Contract (HMCC)

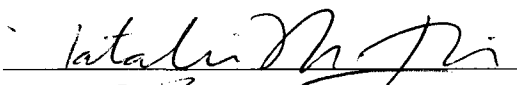
2. Printed screenshot of NRRA's webpage.

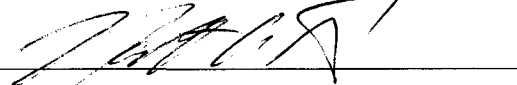
### **CLOSING CONFERENCE**

**Compliance Assistance:** We conveyed to the Schnitzer representatives that the contract option to verify refrigerant recovery was intended to be used with regular customers and executed prior to the time of transaction involving a small appliance or vehicle.

**Concerns:** Schnitzer's HMCC may be being used as a verification statement (i.e., on a per-transaction basis with first-time customers), in which case it lacks the name and address of the person who recovered the refrigerant from the item and the date it was recovered.

### **SIGNATURES**

Report Author:  Date: 10/19/17

Section Chief:  Date: 10/23/17

**Facility Name:** Schnitzer  
**Facility Location:** 200 Allard Drive, Manchester, NH  
**Date of Inspection:** July 28, 2017

**APPENDICES AND ATTACHMENTS**

- Digital Image Log
- Copy of HMCC
- Screenshot of NRRA website

**Facility Name:** Schnitzer  
**Facility Location:** 200 Allard Drive, Manchester, NH  
**Date of Inspection:** July 28, 2017

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Natalie Topinka & Abdi Mohamoud	<b>2. Date(s) of Inspection:</b> July 28, 2017
<b>3. Company/Facility Name:</b> Schnitzer	<b>4. Street Address, City, State:</b> 200 Allard Drive, Manchester, NH
<b>5. Number of Images:</b> 16	<b>6. Archival Record Location:</b> CD-R labeled as "Schnitzer Manchester, NH Inspection Photos"

Image Number	File Name	Date and Time (incl. time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0731.JPG	7/28/2017 8:22 AM		sign at front entrance
2	IMG_0732.JPG	7/28/2017 8:41 AM		scrap pile
3	IMG_0733.JPG	7/28/2017 8:41 AM		scrap pile
4	IMG_0734.JPG	7/28/2017 8:41 AM		white goods on scrap pile
5	IMG_0735.JPG	7/28/2017 8:42 AM		A/C unit
6	IMG_0736.JPG	7/28/2017 8:42 AM		white goods on scrap pile
7	IMG_0737.JPG	7/28/2017 8:44 AM		refrigerator on scrap pile
8	P7280060.JPG	7/28/2017 8:40 AM	43.186667, -71.52	sign at front entrance
9	P7280061.JPG	7/28/2017 8:40 AM	42.989797, -71.472523	sign at front entrance
10	P7280062.JPG	7/28/2017 8:41 AM	42.989377, -71.472695	A/C unit on-site
11	P7280063.JPG	7/28/2017 8:42 AM	42.989367, -71.472662	white goods on scrap pile
12	P7280064.JPG	7/28/2017 8:43 AM	42.989342, -71.472603	label on refrigerator
13	P7280065.JPG	7/28/2017 8:43 AM	42.989348, -71.472615	white goods on scrap pile
14	P7280066.JPG	7/28/2017 8:44 AM	42.989327, -71.4726	refrigerator on scrap pile
15	P7280067.JPG	7/28/2017 8:44 AM	42.989323, -71.4726	label on compressor

**Facility Name:** Schnitzer

**Facility Location:** 200 Allard Drive, Manchester, NH

**Date of Inspection:** July 28, 2017

16	P7280068.JPG	7/28/2017 8:58 AM	42.989722, -71.4725	view of facility entrance
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